

## The Nature Conservancy position on SB1212

Senate Natural Resources, Environment and Great Lakes Committee

September 13, 2012

The Nature Conservancy is a leading conservation organization working to protect the most ecologically important lands and waters around the world for nature and people. The Great Lakes are globally significant because they form the largest freshwater ecosystem on earth. Nothing has so fundamentally changed the Great Lakes over time as the introduction of Aquatic Invasive Species (AIS). For over 50 years, the largest source of AIS is through ballast water discharged from oceangoing ships. The economic and environmental toll on the Great Lakes is high and is still growing. The Nature Conservancy is using science to develop new AIS monitoring tools (such as environmental DNA (eDNA)) and new control and management methods to reduce the impacts of AIS and restore native species.

The Nature Conservancy opposes SB1212, as written, because ballast water exchange alone is not adequate to protect the Great Lakes economy and ecosystem from the introduction of additional AIS. Ballast water exchange is highly effective against some species, and it is much better than allowing "raw" ballast water discharges. However, ballast water exchange alone is inadequate based on current science and federal regulations. There are dozens of euryhaline invertebrates (organisms that can tolerate a wide range of salinity) that could survive transport in a ballast tank following ballast water exchange and be a threat to invade the Great Lakes. The Coast Guard has determined that ballast water exchange alone is not adequate and issued regulations with a schedule requiring transocean vessels entering the Great Lakes use approved ballast water treatment systems. In addition, the EPA's draft ballast water discharge permit requires ballast water exchange and use of a treatment system.

The Nature Conservancy commissioned the widely respected Anderson Economic Group (AEG) to perform the economic analysis needed to sort through the many claims about the costs associated with AIS. Their report, "The Costs of Aquatic Invasive Species to Great Lakes States" identifies the attributes of meaningful economic analyses and then reviews 19 different economic studies on AIS in the Great Lakes. AEG's report provides a conservative, bottom-line clarification to previously released data and reports that have often conflicted. A copy of the report and a related Detroit Business Crain's article are provided for each committee member.

The conclusion of the report is: "Overall, we find that AIS disrupt economic activity on a large scale in each of the Great Lakes states. AIS impose real costs on industries, consumers, and governments. Costs to individual companies and households include direct expenditures on combating an invasive species or repairing the damage it has done, and include indirect costs such as reduced productivity and higher prices in industries particularly affected by AIS. Governments and private actors such as nonprofits also devote significant resources to addressing AIS. The industries most acutely affected by AIS include sport and commercial fishing, water treatment, power generation, industrial facilities using surface water, and tourism. Together, these industries employ over 125,000 workers in the Great Lakes region.

While comprehensive cost estimates (including all industries, species, and waterways of the Great Lakes region) are not available, there are many individual estimates focusing on part of the problem. These cost estimates range from millions of dollars in cost and lost output for individual large industrial and power facilities to hundreds of dollars annually spent by individual households to control AIS on their property." When the average cost per each type of facility substantiated in the report is applied to the hundreds of facilities in the Great Lakes, the overall aggregate level of cost to the Great Lakes region is in the hundreds of millions of dollars annually.

Aquatic invasive species destabilize important ecological processes in the lakes, like aquatic food webs and in doing so threaten the economy of communities and industries that depend on a healthy, functioning Great Lakes ecosystem. The full economic and environmental impact of a new species introduced into the Great Lakes can take decades to become apparent. Zebra and quagga mussels were introduced into Lake St Claire approximately 25 years ago. They continue to spread across North America. As filter feeders, they are destroying the native base of the food chain. This affects forage fish, such as alewives, eaten by the top predators in the food chain. We have now seen the salmon population, and associated sport fishery, crash in Lake Huron. And as selective eaters, the mussels are concentrating blue-green algae, and contributed to the formation of massive blue-green algal bloom of historic proportions, last year in Lake Erie.

To control future costs and limit ecological damage, it is critical to significantly reduce the risk of new invasions of AIS. The proposed change in ballast water regulation contained in SB1212 is moving in the wrong direction, it will increase the risk of new AIS becoming established in the Great Lakes. SB 1212 is not protective enough for Michigan waters because relying on ballast water exchange alone can still allow a significant amount of invasive species to enter the Great Lakes. Both the U.S. Coast Guard and the E.P.A. have determined that ballast water exchange alone is not adequate to protect the Great Lakes. The Coast Guard issued new rules this year requiring transocean vessels to install approved ballast water treatment systems.

Michigan has always been a leader in protecting the Great Lakes. We are concerned that SB 1212 reverses this legacy and would threaten the fish, wildlife and economic vitality of the Great Lakes. We should continue our leadership role by working with other states to develop common ballast water discharge standards that effectively protect our waters from invasive species. The Great Lakes and the jobs which rely on them are too important to rely on inadequate protective measures. The Nature Conservancy opposes SB 1212.

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